

-- REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED --

EXHIBIT 11

Exhibit 11 to Declaration of John Soumilas, Esquire in Support of Plaintiff's Motion to Certify Class
Ramirez v. Trans Union, LLC No. 12-cv-00632-JSC

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LA 51663351v3

SUPPLEMENTAL RESPONSES OF DEFENDANT TRANS UNION LLC TO
PLAINTIFF'S FIRST SET OF INTERROGATORIES
Case No. 3:12-cv-00632-JSC

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SPECIFIC RESPONSES

INTERROGATORY NO. 1:

State the number of natural persons in the State of California to whom Defendant has sent the type of letter substantially similar in form to the one Plaintiff received from Defendant's Woodlyn, Pennsylvania facility dated March 1, 2011, "Regarding: OFAC (Office of Foreign Assets Control) Database (produced as Ramirez 7 in this matter) from February 9, 2010 through the present.

RESPONSE TO INTERROGATORY NO. 1:

Trans Union objects to this Interrogatory on the grounds, among others, that: (i) it is vague and ambiguous; (ii) it is overly broad, burdensome and harassing; and (iii) it seeks confidential, proprietary business information that belongs to Trans Union. Without waiving and subject to, these objections and the General Objections, Trans Union responds to this Interrogatory as follows: Approximately 1,518, based on unique social security numbers. For purposes of this response, Trans Union analyzed only the population of consumers who requested a file disclosure and received the OFAC letter, as this was the only data that was reasonably accessible as of the date of

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1 this response. Although the Order does not require Trans Union to supplement this response, it
 2 appears that the number of unique consumers was overstated in the prior response because the prior
 3 response was based on data relating to the number of OFAC letters requested to be generated, and
 4 some consumers received the OFAC letter more than once.

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6 **INTERROGATORY NO. 2:**

7 Identify by name and address the persons who comprise your response to Interrogatory
 8 No. 1.

9 **RESPONSE TO INTERROGATORY NO. 2:**

10 Trans Union objects to this Interrogatory on the grounds, among others, that: (i) it is vague
 11 and ambiguous; (ii) it is overly broad, burdensome and harassing; (iii) it seeks information in which
 12 non-parties have a legitimate expectation and/or right of privacy; (iv) it seeks confidential,
 13 proprietary business information that belongs to Trans Union; (v) there is no permissible purpose
 14 for disclosure under 15 U.S.C. § 1681b; and (vi) it is an improper request prior to class
 15 certification. Without waiving and subject to, these objections and the General Objections, Trans
 16 Union, pursuant to pp. 4-5 of the Order, responds to this Interrogatory as follows: See list attached
 17 hereto as Exhibit "A."

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19 **INTERROGATORY NO. 3:**

20 State the number of natural persons in the United States to whom Defendant has sent the
 21 type of letter substantially similar in form to the one Plaintiff received from Defendant's Woodlyn,
 22 Pennsylvania facility dated March 1, 2011, "Regarding: OFAC (Office of Foreign Assets Control)
 23 Database (produced as Ramirez 7 in this matter) from February 9, 2010 through the present.

24 **RESPONSE TO INTERROGATORY NO. 3:**

25 Trans Union objects to this Interrogatory on the grounds, among others, that: (i) it is vague
 26 and ambiguous; (ii) it is overly broad, burdensome and harassing; and (iii) it seeks confidential,
 27 proprietary business information that belongs to Trans Union. Without waiving and subject to,

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1 these objections and the General Objections, Trans Union responds to this Interrogatory as follows:
2 Approximately 8,192, based on unique social security numbers. For purposes of this response,
3 Trans Union only analyzed the population of consumers who requested a file disclosure and
4 received the OFAC letter, as this was the only data that was reasonably accessible as of the date of
5 this response. Although the Order does not require Trans Union to supplement this response, it
6 appears that the number of unique consumers was overstated in the prior response because the prior
7 response was based on data relating to the number of OFAC letters requested to be generated, and
8 some consumers received the OFAC letter more than once.

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